

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES,
2011

Docket No. N2012-1

**RESPONSES OF WITNESS ROBERT J. BROXTON (NPMHU-T7) TO UNITED
STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
NATIONAL POSTAL MAIL HANDLERS UNION WITNESS BROXTON
(USPS/NPMHU-T7-1—4)**

(June 6, 2012)

Attached are the responses of witness Robert J. Broxton (NPMHU-T7) to the Interrogatories of the United States Postal Service (USPS/NPMHU-T7-1-7) filed May 23, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Patrick T. Johnson

As agent for and authorized by

/s/ Kathleen M. Keller

Bredhoff & Kaiser PLLC

805 15th St. N.W.

Washington, DC 20005

*Counsel for National Postal Mail Handlers
Union*

June 6, 2012

RESPONSES OF NPMHU WITNESS BROXTON TO POSTAL SERVICE INTERROGATORIES

USPS/NPMHU-T7-1: On page 2, lines 3 through 8 of your testimony, you state:

Based on my review of the consolidations, and my knowledge of the facilities involved, I have particular concerns with three proposed consolidations in the New England area: 1) the consolidation of the Eastern Maine facility into the Southern Maine facility; 2) the consolidation of the White River Junction, Vermont facility into Burlington; and 3) the consolidation of the Central Massachusetts P&DC letter processing into Boston.

Please state your understanding of whether the Eastern Maine P&DC and the White River Junction P&DC consolidation proposals referenced in your statement have been announced as disapproved by the Postal Service since the filing of your testimony.

RESPONSE:

Based on the response filed on June 4, 2012, by Postal Witness Emily Rosenberg to the Commission Information Request No. 1, Question 4(a), it is now my understanding that these two facilities have been removed from consideration for consolidation under either Phase 1 or Phase 2 of the Postal Service's modified plan.

RESPONSES OF NPMHU WITNESS BROXTON TO POSTAL SERVICE INTERROGATORIES

USPS/NPMHU-T7-2: On page 2, lines 9 through 10 of your testimony, you state that the “geography of Maine is the first and primary reason why the consolidation of Eastern Maine into Southern Maine is unsound.”

- a. Please describe, in detail, your experience, education, or training related to logistics management and the transportation of mail between Postal Service facilities (including, but not limited to, the costs and savings analyses of transporting mail).
- b. Please produce any documents or data (including, but not limited to, any geographical data) that you relied upon in support of your statement.

RESPONSE:

- a. My experience is detailed in the first paragraph of my testimony. My testimony is based upon my many years of experience as a Mail Handler working in New England, my years of experience representing Mail Handlers in New England, my life-long residence in New England, and my common sense. As President of NPMHU Local 301, I often drive to the Postal processing facilities in New England and am well familiar with the geography. I do not have any formal education or training in the technical fields referenced.
- b. None.

RESPONSES OF NPMHU WITNESS BROXTON TO POSTAL SERVICE INTERROGATORIES

USPS/NPMHU-T7-3: On page 3, lines 15 through 17 of your testimony, you state that “[p]articularly given that the Middlesex letters—a large daily volume—will also be coming into Boston for processing, I am very concerned that the facility will not be able to efficiently handle the mail in a timely manner.”

- a. Please confirm whether this statement assumes operation in the current network with current service standards.
- b. If your statement does not assume the current network and current service standards, please identify the environment that you are describing in your statement?
- c. Please state in terms of a percentage of current Middlesex mail volume, a volume that you would characterize as "large."
- d. Please define “timely manner.”
- e. Please produce any documents or data that you relied upon in support of your analysis of Boston P&DC’s mail processing capacity and identify and explain the specific portions that support your concern about the timely processing of mail.

RESPONSE:

- a. No.
- b. My testimony assumes an environment in which the location of the Boston P&DC will not change, nor will the major traffic problems going into and coming out of Boston, particularly in the late afternoon and early evening, when much of the mail will be arriving for processing. Of course, the more relaxed the service standards, the lesser the chance that any facility will not be able to process the mail in such a way as to comply with those service standards. Given the logistics and location of the Boston facility, I do have some concerns about its ability to receive, process, and get out such a large quantity of mail under either the interim

RESPONSES OF NPMHU WITNESS BROXTON TO POSTAL SERVICE INTERROGATORIES

service standards announced by the Postal Service effective July 1, 2012, or the more relaxed standards that the Postal Service intends to implement in 2014.

- c. This question does not make sense in connection with my statement. According to the AMP, Middlesex letter volume that will be transferred to Boston is 2,095,131 in FHP daily volume. I would characterize that as a large volume.
- d. I would define timely manner as in compliance with applicable service standards.
- e. I relied upon the AMP studies relating to the Middlesex Essex P&DC.

RESPONSES OF NPMHU WITNESS BROXTON TO POSTAL SERVICE INTERROGATORIES

USPS/NPMHU-T7-4: On page 4, lines 14 through 15, you state that you “do not believe that the Postal Service’s public input process was adequate to fully explore the local impact of the proposed consolidations.”

- a. Please provide your understanding of the Postal Service's obligation to solicit and consider public input in relation to a mail processing plant consolidation, including, but not limited to, identification of any internal instructions that form the basis for your belief that the current process is not sufficient.
- b. In your view, is it possible for a public input process to comply with applicable internal instructions, but still be deemed as not sufficient by a concerned postal employee or member of the public?

RESPONSE:

- a. The Postal Service’s internal instructions are found at Postal Handbook 408.

As an entity charged with providing an important service to the public, it is my belief and understanding that the Postal Service has an obligation to solicit and consider public input prior to closing a mail processing plant that will have an effect on the community, and will potentially affect mail delivery.
- b. Yes.